

Declaration of Thomas W. Bevan

Thomas W. Bevan states as follows:

1. I am a shareholder with the law firm Bevan & Associates, LPA, Inc.
2. Myself, individually, and my law firm, received a subpoena from BASF Catalysts, LLC in connection with a federal case pending in the U.S. District Court for the District of New Jersey, *Kimberlee Williams, et al. v. BASF Catalysts LLC, et al.*, Civil Action No. 2:11-cv-01754 (JLL) (JAD) (the “Subpoena”).
3. The Subpoena seeks extensive documents in my firm’s possession relating to cases where my firm has represented plaintiffs injured by exposure to asbestos and talc containing asbestos.
4. I estimate that my firm maintains more than 3000 files for current and former clients that are arguably responsive to the Subpoena. These files were originally stored in paper format, but were scanned to TIF images without optical character recognition years before the filing of this lawsuit.
5. These files contain documents that are subject to the attorney-client privilege, work-product privilege, Ohio medical record privilege, and confidentiality protections afforded by agreements with third-parties, court orders, and the Ohio Attorney Ethics Rules (Rule 1.6).

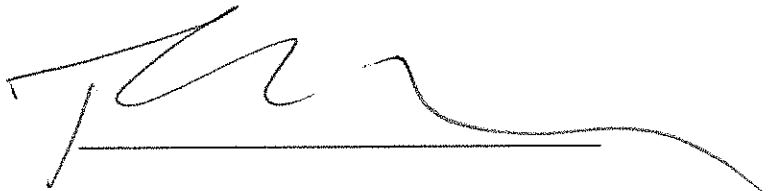
6. In addition, my firm maintains a relational client database that contains information for approximately 14,000 clients. This database contains information protected by the attorney-client and work product privileges.

7. The burden that would be placed on me and my firm by the Subpoena is extreme. My firm is a small business with 10 attorneys. Almost every file contains documents that are protected by one or more privileges and we would be forced to hire an outside vendor to perform the extensive legal review needed to log and produce the files requested by the Subpoena.

8. In connection with the Court's October 27, 2017 order to produce 30 randomly selected client files, my staff has incurred 12 hours preparing and transmitting the files and contacting the clients or their representatives in an attempt to obtain permission to disclose the files to Plaintiffs' counsel.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 29, 2017.



Thomas W. Bevan, Esq.